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July 10, 1996

Office of the Secretary
Federal Communications Committee
1919 M Street NW
Washington, DC 20554
USA

Ref: **Notice of Proposed Rule making**
96-207, MM Docket No. 87-268


Ladies and Gentlemen:

Advanced Broadcasting Systems of Canada (ABSOC) on behalf of its members, who include the majority of Canadian television broadcasters, respectfully submits the attached comments regarding the matters within the NPRM-5 that are of material interest to them, and indeed to broadcasters throughout America.

Canadian broadcasters and related organisations have an excellent record of cooperation with their counterparts in the United States and in the development of the ATSC standard for DTV have been able to continue this excellent and mutually beneficial relationship through many contributions to the work. They thus have both a demonstrable interest in this current action and an in-depth knowledge of the key aspects of the standard and its possible implementations, thus lending significant authority to the attached comments.

The conclusions of this action by the Commission will be of great impact to TV broadcasters on both sides of the border and we thus are grateful for this opportunity to place the comments of Canadian television broadcasters into the record at this time.

Yours sincerely,


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Att. Comments of Canadian TV Broadcasters, July 10, 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Advanced Television Systems)	
and Their Impact Upon the)	MM Docket No. 87-268
Existing Television Broadcast)	
Service)	
And in the Matter of)	
)	
The Fifth Further Notice of)	FCC 96-207
Proposed Rule Making)	

COMMENTS OF CANADIAN TV BROADCASTERS

Introduction

The development of a system for the delivery of digital television services to the public within the current VHF and UHF spectrum allocations has been a subject of great interest, not only to broadcasters in the United States, but also to broadcasters, researchers and other industrial segments in Canada, who co-ordinate their activities within Advanced Broadcasting Systems of Canada Inc. (ABSOC) and the Joint Technical Committee on Advanced Broadcasting (JTCAB). The efficient use of spectrum, the delivery of enhanced services and innovative new services (such as HDTV) to the public and the convergence of broadcasting, telecommunications and computers are factors of concern to broadcasters globally and are but some of the visible forces that move broadcasting in the direction of fully digital production, transmission and delivery. Canadian interests have made significant contributions to the technical work supporting the standard for digital television broadcasting forming a key element of this current action and thus have both a demonstrable material interest in it and a depth of knowledge concerning its content, basic technologies and implementation scenarios. Based on many years of practical experience, it is evident that there are significant benefits to be found for both the public and the broadcasters, in the use of common standards across national boundaries and across various delivery media for television services.

The main sectors of the Canadian television industry that are affected by the current action in respect of a standard for terrestrial, over-the-air delivery of television services include:

- (a) Private television stations and networks, represented by the Canadian Association of Broadcasters (CAB), a national industry association having 71 member stations and 1 member network;
- (b) The public television broadcaster, the Canadian Broadcasting Corporation (the CBC). The CBC operates 536 English TV and 199 French TV transmitters and also operates 458 English Radio and 185 French Radio transmitters, providing coverage to most Canadians;

(c) Licensed pay and specialty television services, cable television distribution systems and satellite service provider;

(d) Educational and other non-commercial community television broadcasters are also likely to be affected by the introduction of digital television services. Their interests have been taken into account in the considerations forming the basis of this commentary.

It is clear that the introduction of digital television services, made possible by the adoption of a standard for Advanced Television (ATV), will have a significant impact on the North American television industry and thus the members of Advanced Broadcasting Systems of Canada Inc. wish to express their views on matters of common interest in regard to the Fifth Notice of Proposed Rule Making of the Commission.

The Need for a Single Standard for Broadcasting

An orderly transition from the current analogue NTSC environment to a fully digital environment is essential in view of the interests of the public and the broadcasters in services, equipment and spectrum. Major investments will be required in each of these areas and time is of the essence in a successful introduction of digital services. The risks inherent in a drawn out, market-driven selection of a standard would thus be unacceptable. Little advantage can be seen in the encouragement of unnecessary technical barriers, incompatibilities limiting access to services and uncertainties in the introduction of consumer equipment brought about by multiple or undeclared standards. Documentation of a single standard of wide application will thus be of major benefit to all affected interests, the public, broadcasters and content providers, as well as the industries supplying their equipment needs.

It is further noted that the adoption of a single, mandatory standard would facilitate coordination of frequency allotments in USA/Canada border areas, thus ensuring reception by viewers in both countries, of TV services from both NTSC and ATV sources.

Thus, Canadian TV broadcasters support the adoption of a single, mandatory standard for digital terrestrial television broadcasting.

The Scope and Content of the Standard

Canadian TV broadcasters require a standard for digital television broadcasting that takes good advantage of available, or near-available technologies while retaining, to the maximum extent, the spectrum efficiency and flexibility in services, technical parameters and user features inherent in a digital system. In this way, the standard would enable high-quality, economically-viable services in the initial phases, while offering the extensibility and opportunities for innovation needed to maintain its viability and the value of the investments dependant on it, for a considerable time into the future.

The ATSC DTV standard meets these basic requirements, offering state-of-the-art technology, considerable flexibility to enhance current services and to add new innovative ones and extensibility to take advantage of new technologies, as they become viable and useful. Canadian TV broadcasters recognize, however, that practical application of this standard may reveal some areas where further refinement of it may prove to be beneficial and express their willingness to continue their collaboration in any such activity.

The Application of the Standard - Interoperability

In June of 1994, the ABSOC ATV Implementation Task Group published the "Vision of the Moment" document that identified the Canadian issues requiring consideration. The document emphasises the importance of standards for an efficient transition to digital technologies: "Technical standards for over-the-air broadcast, wired delivery, and DTH delivery must lead to inter-operability between delivery modes and an economic common receiver for the home consumer." Consequently, ABSOC prepared initial technical recommendations, to be considered by Industry Canada, for the transition of 525 line based systems to digital technology. These recommendations include the utilisation of MPEG-2 technology for the video and transport layers, and the use of the same audio technology as the ATV standard.

It is believed to be important that the standards adopted for ATV and for other delivery media, including cable, satellite and telecommunications networks include a maximum degree of commonality, to ensure both interoperability and acceptable levels of cost to consumers and service providers.

The Canadian TV broadcasters are of the opinion that the established standard should promote maximum inter-operability, particularly for consumer equipment.

Conclusions

The introduction of digital terrestrial television is a key element in the convergence of broadband digital services to the public and of great concern to Canadian TV broadcasters. In view of the many stakeholders involved, including particularly the public, it is essential that it be introduced in an orderly, coordinated fashion, balancing these interests and ensuring a continued availability of a full range of television services. It is believed that this is best achieved by:

- The adoption of a single, mandatory standard for over-the-air terrestrial TV broadcasting;
- The selection of a standard that is technically advanced, proven and economically viable for this purpose;
- The selection of a standard that enables efficient use of the VHF/UHF broadcasting spectrum, both in the transitional period and in a future all-digital period;
- The adoption of related industry standards that lead to inter-operability between all delivery media and an economic, common receiver for the consumer.

Comments submitted by: **Advanced Broadcasting Systems of Canada Inc. (ABSOC)**
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Who's members include: **Canadian Association of Broadcasters, Ottawa, Ont.**

Canadian Broadcasting Corporation, Ottawa, Ont.

Canadian Cable Television Association, Ottawa, Ont.

Canadian Satellite Users Association, Toronto, Ont.

Telesat Canada

Date: **July 10th. 1996**

Carol A. Darling,
Chair.